

THE HONORABLE JAMAL N. WHITEHEAD

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

**IN RE VALVE ANTITRUST
LITIGATION**

No. 2:21-cv-00563-JNW

This Filing Relates to:
Consumer Plaintiffs

**STIPULATION AND ORDER REGARDING
CONSOLIDATED AMENDED COMPLAINT AND
MOTION TO DISMISS BRIEFING SCHEDULE;
PLAINTIFFS' STATEMENT REGARDING
INTERIM LEAD COUNSEL OBLIGATIONS**

NOTE ON MOTION CALENDAR:

June 2, 2025

On May 2, 2025, this Court appointed Cohen Milstein Sellers & Toll PLLC, attorneys for the *Hepler* Plaintiffs, as Interim Lead Class Counsel for the putative Consumer Class. *See Order*, ECF No. 441 (“Appointment Order”). In light of the Court’s Order, Interim Lead Class Counsel have met and conferred with Counsel for Defendant Valve Corporation (“Valve”), and the Parties hereby stipulate and agree to the following schedule for (a) Interim Lead Class Counsel to file a Consolidated Amended Complaint (“CAC”) for the Consumer Class, and (b) Valve to Answer or otherwise respond to the CAC:

Case Event	Date
Plaintiffs' Deadline to File CAC	Friday, June 27, 2025
Valve's Deadline to Answer or Move to Dismiss the CAC	Friday, August 22, 2025
Plaintiffs' Deadline to Respond to Any Motion to Dismiss	Friday, October 3, 2025

1	Valve's Deadline to Reply in Support of Any Motion to Dismiss	Friday, October 24, 2025
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3 **Plaintiffs' Statement Regarding Interim Lead Class Counsel Duties**

4 In addition to the above stipulation, the Consumer Plaintiffs write to apprise the Court of
 5 Interim Lead Class Counsel's progress effectuating the duties set forth in Section 4.4 of the
 6 Appointment Order. Neither Valve nor the Publisher Class take any position on this statement.

7 Interim Lead Class Counsel has discussed with Valve and the Publisher Class potential
 8 stipulations or amendments to enable Consumer Plaintiffs' counsel to access sealed filings,
 9 documents and data produced in discovery, and other material protected under the Court's Protective
 10 Order. Based on those discussions, Interim Lead Class Counsel do not anticipate significant hurdles
 11 to reaching agreed solutions, though the Parties are still negotiating the scope and shape of any
 12 agreement.

13 Additionally, mindful of the Court's expectation that Interim Lead Class Counsel will take a
 14 "collaborative approach" to its appointment, Appointment Order at 10, and the Court's anticipation
 15 that Interim Lead Class Counsel will "delegate specific tasks to other counsel or committees of
 16 counsel, as authorized by the Court, in a manner to ensure that pretrial preparation for the plaintiffs
 17 is conducted efficiently and effectively," *id.* at 11, the Consumer Plaintiffs intend, absent contrary
 18 instruction by the Court, to assign a variety of pre-trial work to Hagens Berman Sobol Shapiro LLP
 19 to take advantage of that firm's skill and experience, including consultation on strategic issues,
 20 research, drafting, and discovery. Consistent with the Appointment Order, Interim Lead Class
 21 Counsel will inform the Court prior to delegation of tasks to additional counsel.

22 Should the Court require any additional information regarding the above, or any of Interim
 23 Lead Class Counsel's other obligations set forth in Section 4.4 of the Court's Order, the Consumer
 24 Plaintiffs will promptly provide a status report.

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3 Dated: June 2, 2025

4 /s/ Robert W. Cobbs

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Respectfully submitted,

/s/ Ralia Polechronis

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IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

DATED: _____